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12 JUAN C. AVILA

13
14 IN THE UNITED STATES DISTRICT COURT
15 FOR THE EASTERN DISTRICT OF CALIFORNIA

16
17 UNITED STATES OF AMERICA,
18 Plaintiff,
19 v.
20 JUAN C. AVILA,
21 Defendant.

22 Case No. 1:24-cr-00053-JLT
23 STIPULATION TO TERMS OF TEMPORARY
24 RELEASE; ORDER

25 Date: July 18, 2025
26 Time: 2:00 p.m.
27 Judge: Hon. Erica P. Grosjean

28 In response to this Court's Order, the parties through their respective counsel, Assistant United States Attorney Chan Hee Chu, counsel for plaintiff, and Assistant Federal Defender Lisa N. Lumeya, counsel for Juan Carlos Avila, provide the following stipulation with proposed terms of temporary release. *See* ECF No. 20.

29 If this Court grants Mr. Avila's motion for temporary release to appear at his scheduled
30 state court hearing, Mr. Avila's third-party custodian, Ms. Barbara Gutierrez, has made the
31 necessary arrangements to closely accompany him throughout the approved travel. In addition to
32 confirming childcare, Ms. Gutierrez has also secured a vehicle and booked a hotel room. The
33 parties propose Mr. Avila be temporarily released from the Central Valley Annex into Ms.
34 Gutierrez's custody on Monday, July 21, 2025. Ms. Gutierrez is prepared to transport Mr. Avila
35 from Central Valley Annex, located at 254 Taylor Avenue, McFarland, California, 93250, to the
36 Clark County District Court, located at 1200 Franklin Street, Vancouver, Washington, 98660. The
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1 Clark County District Court is located about 850 miles from the Central Valley Annex, and the
2 estimated travel time by car is at least about thirteen hours. Ms. Gutierrez has rented one hotel
3 room for her and Mr. Avila to share from Tuesday, July 22, to Wednesday, July 23. On
4 Wednesday, July 23, Ms. Gutierrez would accompany Mr. Avila to his scheduled court appearance
5 at 1:30 p.m. at the Clark County District Court. At the conclusion of his case-related proceedings,
6 Ms. Gutierrez would then immediately accompany Mr. Avila back to the Central Valley Annex to
7 return by Friday, July 25, 2025.

8 Accordingly, the parties respectfully request that proposed terms be imposed.
9

10 Respectfully submitted,

11 KIMBERLY A. SANCHEZ
12 Acting United States Attorney

13 Date: July 18, 2025

14 /s/ Chan Hee Chu
15 CHAN HEE CHU
16 Assistant United States Attorney
17 Attorney for Plaintiff

18 Date: July 18, 2025

19 /s/ Heather E. Williams
20 HEATHER E. WILLIAMS
21 Federal Defender

ORDER

Upon consideration of Defendant Juan Carlos Avila's (USMS No. 18650-032) motion for temporary release, IT IS HEREBY ORDERED that the motion is GRANTED. Mr. Avila shall be released from Central Valley Annex to the custody of his third-party custodian, Barbara Gutierrez, at 8:00 a.m. on Monday, July 21, 2025. Ms. Gutierrez shall transport and closely accompany Mr. Avila to his court appearance at 1:30 p.m. at Clark County District Court, located at 1200 Franklin Street, Vancouver, Washington, 98660. Immediately following the conclusion of his case-related proceedings, Ms. Gutierrez will transport and return Mr. Avila directly to the Central Valley Annex by Friday, July, 25, 2025.

While on temporary release, Mr. Avila is ordered to obey all laws and imposed conditions, and remain at all times in the presence of Ms. Gutierrez.

IT IS SO ORDERED.

Dated: **July 18, 2025**

/s/ *Evan P. Gross*
UNITED STATES MAGISTRATE JUDGE